

**IN THE UNITED STATES DISTRICT COURT OF ALABAMA
MIDDLE DISTRICT COURT OF ALABAMA
NORTHERN DIVISION**

| | | |
|------------------------------------|---|-------------------------------------|
| AMANDA TURNER NOBLES, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Civil Action No. 2:05-CV-886 |
| |) | |
| ZENTA AND PROTOCOL RECOVERY |) | |
| SERVICES, INC. |) | |
| |) | |
| Defendants. |) | |

MOTION FOR EXTENSION OF TIME TO ANSWER

COMES NOW the Defendant designated as Protocol Recovery Services, Inc., and respectfully requests this Honorable Court to extend the deadline to answer this Complaint for thirty days or until November 18, 2005. This case involves alleged violations of the Fair Debt Collection Practices Act as well as common law claims of negligence and invasion of privacy. The Defendant is in the process of investigating the allegations in the Complaint and requires additional time to form a meaningful response. This Motion is not made to delay the progress of this case and the Defendant represents that allowing additional time to answer will not cause the initial trial setting to be delayed or otherwise prevent this case from being prepared in a timely and expeditious manner. The Defendant represents that the substantive rights of the litigants will not be damaged by allowing an additional thirty (30) days to file an answer. The Court's consideration of this issue is greatly appreciated.

Respectfully submitted,

// s Neal D. Moore, III
Neal D. Moore, III (ASB-3971-M73N)

OF COUNSEL:
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CERTIFICATE OF SERVICE

This is to certify that on this the **18th** day of **October, 2005**, a copy of the foregoing document has been served upon counsel for all parties to this proceeding via EMC/CF e-filing:

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This is to certify that on this the **18th** day of **October, 2005**, a copy of the foregoing document has been served upon counsel for all parties via United States mail:

Zenta
435 Devon Park Drive
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// s Neal D. Moore, III
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